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7 Attorneys for Defendant  
8 FEREIDOUN KHALILIAN

9  
10 **UNITED STATES DISTRICT COURT**

11  
12 **DISTRICT OF NEVADA**

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 FEREIDOUN KHALILIAN,

Defendant.

Case No. 23-CR-222-RFB

**UNOPPOSED MOTION TO SEAL  
EXHIBIT C AND D TO  
DEFENDANT'S REPLY IN  
SUPPORT OF MOTION TO  
SUPPRESS RECORDED  
TELEPHONE CALLS;  
DECLARATION OF COUNSEL**

17 Defendant Fereidoun Khalilian, through his undersigned counsel, respectfully  
18 requests leave to file Defendant's Exhibit C and D to Defendant's Reply In Support of  
19 Motion to Suppress Recorded Telephone Calls (dkt 47) under seal. This unopposed  
20 motion is based on the attached declaration of counsel.

21 Respectfully submitted,

22  
23 CUAUHTEMOC ORTEGA  
Federal Public Defender

24  
25 DATED: February 2, 2024

By /s/ Jonathan C. Aminoff

26 JONATHAN C. AMINOFF  
27 ADAM OLIN  
28 Deputy Federal Public Defenders  
Attorney for FEREIDOUN KHALILIAN

1                   **MEMORANDUM OF POINTS AND AUTHORITIES**

2                   A court has supervisory powers over its records and files to seal documents  
3 under appropriate circumstances. *See United States v. Mann*, 829 F.2d 849, 853 (9th  
4 Cir. 1987). Local Rule IA 10-5(a) provides that a party may request that documents be  
5 filed under seal.

6                   The underlying documents contain confidential personal identifying information  
7 of a non-party and the alleged victim. As such, defense counsel respectfully requests  
8 that Exhibit C and D to Defendant's Reply (dkt. 47) be filed under seal.

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10                   Respectfully submitted,

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12                   CUAUHTEMOC ORTEGA  
13                   Federal Public Defender

14                   DATED: February 2, 2024

15                   By /s/ Jonathan C. Aminoff  
16                   JONATHAN C. AMINOFF  
17                   ADAM OLIN  
18                   Deputy Federal Public Defenders  
19                   Attorney for FEREIDOUN KHALILIAN

1                   **DECLARATION OF JONATHAN C. AMINOFF**

2                   I, Jonathan C. Aminoff, declare:

3                   1. I am a Deputy Federal Public Defender admitted to practice in the District  
4 of Nevada. I am counsel of record for defendant Fereidoun Khalilian.

5                   2. By this motion, I request that the Court seal Mr. Khalilian's Exhibit C and  
6 D.

7                   3. Exhibit C and D contain confidential personal identifying information  
8 about the alleged victim and a non-party to this case.

9                   4. On January 31, 2024, the defense publicly filed redacted versions of these  
10 documents. The redactions were done by the government at the time the documents  
11 were produced to the defense and are not subject to a protective order.

12                  5. On February 1, 2024, Assistant United States Attorney Sara Vargas,  
13 counsel for the government in this matter, alerted me that there were several private  
14 phone numbers that were not redacted from the exhibits. Ms. Vargas indicated, via  
15 email, that she does not oppose the this motion.

16                  I declare under penalty of perjury under the laws of the United States of America  
17 that the foregoing is true and correct.

18                  Executed on February 2, 2024, in Los Angeles, California.

19  
20                  \_\_\_\_\_  
21                  */s/ Jonathan C. Aminoff*  
22                  \_\_\_\_\_  
23                  JONATHAN C. AMINOFF  
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13 UNITED STATES OF AMERICA,

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15 v.

16 FEREIDOUN KHALILIAN,

17 Defendant.  
18

19 Case No. 23-CR-222-RFB

20  
21 **PROPOSED ORDER TO SEAL  
EXHIBIT C AND D TO  
DEFENDANT'S REPLY IN  
SUPPORT OF MOTION TO  
SUPPRESS RECORDED  
TELEPHONE CALLS**

22  
23 GOOD CAUSE HAVING BEEN SHOWN IT IS HEREBY ORDERED that:

24 Mr. Khalilian's *motion* to file Exhibit C and D *under seal* is GRANTED.

25  
26 DATED: February 2 , 2024

27 By \_\_\_\_\_

28 HONORABLE RICHARD F. BOULWARE, II  
United States District Judge

29 Presented by:  
30

31 /s/ Jonathan C. Aminoff  
32 JONATHAN C. AMINOFF  
33 Deputy Federal Public Defender